## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

RICHARD BANKHEAD,	)
Plaintiff,	)
V.	) CASE NO. 03:07CV208-MHT
AMERICAN SUZUKI MOTOR CORP.	, )
Defendant.	) )

## <u>DEFENDANT'S RULE 26 PRE-TRIAL DEPOSITION DESIGNATION</u> <u>DISCLOSURE</u>

Defendant American Suzuki Motor Corporation ("ASMC") says as follows in support of its Rule 26 Pre-Trial Deposition Designation Disclosure pursuant to the Court's Uniform Scheduling Order:

- **Deposition Testimony.** Pursuant to Section 10 of the Uniform Scheduling Order, and without waiving any objections to the admissibility of the testimony, ASMC hereby identifies the following deposition transcript excerpts that it may use at trial (except ASMC has not identified those deposition transcript excerpts that it may use solely for impeachment purposes).
  - A. Deposition of Richard Bankhead:
    - 1. Page 5, line 12 through 18.
    - 2. Page 17, line 5 through 23.

- 3. Page 18, line 23.
- 4. Page 19, line 1 through 10.
- 5. Page 25, line 14 through 23.
- 6. Page 26, line 1 through 18.
- 7. Page 27, line 8 through 23.
- 8. Page 28, line 1 through 23.
- 9. Page 30, line 12 through 23.
- 10. Page 31, line 1 through 23.
- 11. Page 32, line 1 through 18.
- 12. Page 33, line 14 through 23.
- 13. Page 34, line 1 through 23.
- 14. Page 35, line 1 through 23.
- 15. Page 36, line 1 through 2.
- 16. Page 40, line 10 through 23.
- 17. Page 41, line 1 through 13.
- 18. Page 43, line 14 through 23.
- 19. Page 44, line 1 through 23.
- 20. Page 45, line 21 through 23.
- 21. Page 46, line 1 through 23.
- 22. Page 47, line 1 through 23.

- 23. Page 48, line 13 through 23.
- 24. Page 49, line 1 through 23.
- 25. Page 50, line 1 through 23.
- 26. Page 51, line 1 through 23.
- 27. Page 52, line 1 through 23.
- 28. Page 53, line 16 through 23.
- 29. Page 54, line 1 through 21.
- 30. Page 57, line 4 through 23.
- 31. Page 58, line 1 through 23.
- 32. Page 59, line 10 through 23.
- 33. Page 60, line 1 through 4.
- 34. Page 61, line 6 through 17.
- 35. Page 62, line 6 through 23.
- 36. Page 63, line 1 through 10.
- 37. Page 66, line 1 through 23.
- 38. Page 67, line 1 through 23.
- 39. Page 68, line 1 through 23.
- 40. Page 69, line 1 through 22.
- 41. Page 70, line 7 through 23.
- 42. Page 71, line 1 through 23.

- 43. Page 72, line 14 through 23.
- 44. Page 73, line 1 through 23.

Respectfully submitted this 4th day of September, 2008.

/s/ John D. Mayo

One of the Attorneys for Defendant American Suzuki Motor Corp.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of September, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

> Zachary T. Collins, Esq. 207 Montgomery Street, Suite 215 Montgomery, Alabama 36104

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> /s/ John D. Mayo Of Counsel